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October 30, 2024

The Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Mohamed Bahi, 24 Mag. 3535

Dear Judge Netburn:

We write on behalf of the Defendant in the above-referenced matter, Mohamed Bahi, to respectfully request an additional extension of time to meet the conditions of release detailed by Your Honor on October 8, 2024. Mr. Bahi submitted two co-signers that provided requested documents to the government and were interviewed during the week of October 16th. Given the financial resources of one of the two co-signers, the government asked whether a substitute co-signer could be utilized. Mr. Bahi thereafter provided an additional co-signer, and his interview took place on October 25. The government has requested additional documents from this co-signer, which the defense is working to obtain. As a result of the foregoing, we respectfully request an extension of time until November 8, 2024 for the defendant to fully satisfy the conditions of release. The defense will work diligently to satisfy the conditions of release as soon as possible. The government does not object to this request.

Respectfully submitted,

/s/Derek Adams
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